ROBERT IAN STRINGHAM, SBN 324878 1 California Legal Research 1922 N Highland Avenue #28 2 Los Angeles, CA 90068 3 215-275-1112 ianstringham@californialegalresearch.org 4 5 TASHA ALYSSA HILL, SBN 301865 6 The Hill Law Firm 5132 York Blvd. #50681 7 Los Angeles, CA 90042 424-282-3836 8 tashahilllaw@gmail.com 9 Attorneys for Petitioner 10 11 12 SUPERIOR COURT OF THE STATE OF CALIFORNIA 13 FOR THE COUNTY OF LOS ANGELES 14 15 Case No. 20STCP00249 ADRIAN RISKIN, 16 **Verified Petition for Writ of Mandate** Petitioner, 17 **Ordering Compliance with the California** vs. **Public Records Act** 18 19 CITY OF LOS ANGELES, [Government Code §§ 6250 et seq.; Code of Civil Procedure § 1085] Respondent. 20 21 22 23 24 25 26 27 28

- Petitioner Adrian Riskin petitions this Court for a writ of mandate requiring Respondent City of Los
 Angeles to immediately make available to Petitioner public records lawfully requested by Petitioner
- 3 pursuant to the California Public Records Act ("CPRA"), Government Code § 6250, et seq. Petitioner also
- 4 respectfully requests that this Court grant relief in the form of costs of suit, attorney's fees, and other
- 5 appropriate and just relief resulting from Respondent's unlawful conduct. Petitioner alleges as follows:

6 PARTIES

- 7 1. Petitioner Dr. Adrian Riskin is a resident of Los Angeles, a professor at a local college, and an
- 8 open records activist. Using CPRA requests to investigate and understand the activities of the Los Angeles
- 9 City government, Riskin makes all his findings freely available to the public through blogging and
- 10 community events. His collection of records have helped both researchers and the public at large learn
- about the city's response to the homelessness crisis, including students at U.C. Berkeley School of Law's
- 12 Policy Advocacy Clinic, and documentary filmmakers producing a film about the Greater West
- Hollywood Food Coalition. Records obtained by Riskin have also been featured as part of an exhibit at
- 14 the Los Angeles Poverty Department Skid Row History Museum. Moreover, Riskin has helped to
- empower the public by publishing a guide to the practical use of the CPRA in the City of Los Angeles.
- Riskin is a member of the public within the meaning of §§ 6252(b)-(c).
- 2. Respondent City of Los Angeles is a local agency within the meaning of Government Code §
- 18 6252(a).

19 **JURISDICTION AND VENUE**

- 3. This court has jurisdiction over this petition pursuant to Government Code §§ 6258 & 6259 and Code of Civil Procedure § 1085.
- 4. Venue is proper in this Court. The records in question, or some portion of them, are situated in the
- County of Los Angeles. See Gov't Code § 6259(a). Also, Respondent city is located in the County of Los
- 24 Angeles. See Code Civ. Proc. § 394(a).

25 GENERAL ALLEGATIONS

- 5. This dispute arises from the failure of the City of Los Angeles to respond to a request for public
- 27 records.
- 28 ///

1	6. In the summer of 2019	it became publicly l	known that Los Angeles	Police Department ("L	APD"
---	--------------------------	----------------------	------------------------	-----------------------	------

2 officers were participating in two private Facebook groups: "Crimebusters of West Hills and Woodland

3 Hills" and "Homeless Transient Encampments of our West Valley." Following numerous complaints by

4 homelessness advocates about demeaning comments, anti-homeless sentiments, and promotion of

5 vigilantism on both pages, LAPD conducted a formal investigation of officer participation in the groups.

7. On July 16, 2019, Petitioner made a records request through email on Respondent pursuant to the

CPRA. He sent the email to Tran Le, the Director of Communications for CD7 Councilwoman Monica

Rodriguez. The request sought for emails between Councilwoman Rodriguez and CD7 staff regarding

officers and private citizens who are known to have participated in these Facebook groups. The request

specified a timeframe, specified a list of senders and receivers, and specified a series of keywords to search

for. A true and correct copy of the request is attached as Exhibit A.

8. On July 16, 2019, when Petitioner received an automated away message from Ms. Le, Petitioner

immediately forwarded the request to CD7 staff members Doug Tripp and Denaee Amaya per the away

message's instructions. True and correct copies of the away message and Petitioner's forwarded email are

attached as Exhibits B and C respectively.

9. Ms. Le acknowledged receipt of the email on July 19, 2019. She estimated that, due to the "volume

of the search terms," Respondent would provide an answer as to whether or not responsive records existed

by August 9, 2019, 21 days later. A true and correct copy of this correspondence is attached as Exhibit D.

19 10. Given that the response time was outside of the typical 10-day CPRA response deadline, Petitioner

assumed Respondent was implicitly extending the deadline by an additional 14 days as allowed for by

21 CPRA § 6253(c) in "unusual circumstances."

22 11. On August 23, 2019, <u>35 days</u> after his initial request and <u>11 days</u> after expiration of the 14-day

extension, Petitioner had received no response from Respondent and emailed Ms. Le regarding the status

of his request. Petitioner also sought clarification as to how the "volume of the search terms" amounted

to a reason for delay, as the, "City's Gmail system can be searched for multiple keywords in a single

operation, so that there is no practical difference between searching for one keyword or a thousand." A

true and correct copy of this correspondence is attached as Exhibit E.

28 ///

7

8

9

10

11

13

14

15

17

18

20

23

24

25

26

- 1 12. On September 16, 2019, <u>58 days</u> after his initial request and <u>34 days</u> after expiration of the 14-day 2 extension, Petitioner had not received any response from Respondent and emailed Ms. Le regarding the 3 status of his request. A true and correct copy of this correspondence is attached as Exhibit F.
- 13. On October 7, 2019, <u>80 days</u> after his initial request and <u>56 days</u> after expiration of the 14-day extension, Petitioner had still not received any response from Respondent and again emailed Ms. Le regarding the status of his request. A true and correct copy of this correspondence is attached as Exhibit G.
- 8 14. Since Ms. Le's July 19, 2019 email, Petitioner has not received any response from Respondent regarding his July 16, 2019 CPRA request.

10 CAUSE OF ACTION

For Violations of the California Public Records Act, Gov't Code § 6250 et seq.

- 15. Petitioner realleges and incorporates by reference the preceding paragraphs in this Petition.
- 13 16. Pursuant to Government Code § 6258, any persons may "institute proceeding for injunctive or declaratory relief or writ of mandate in any court of competent jurisdiction to enforce his or her right to
- inspect or receive a copy of any public record or class of public records under this chapter."
- 17. The records Petitioner seeks are public records, i.e., writings related to the conduct of the public's business.
- 18. Upon information and belief, Petitioner alleges that Respondent prepared, retained, used, or has control or constructive possession of public records that are responsive to Petitioner's request.
- 19. Petitioner alleges in accordance with Government Code § 6259(a) that the information it seeks from Respondent is maintained in Los Angeles County.
- 22 20. Respondent's failure to provide responsive public records violates the CPRA.
- 21. Petitioner requests that this Court issue a writ of mandate compelling Respondent to release the requested records.
- 25 ///

11

- 26 ///
- 27 ///
- 28 ///

REQUEST FOR RELIEF WHEREFORE, Petitioner respectfully requests judgement as follows: 1. That the Court issue a peremptory writ of mandate directing Respondent to make all requested documents available for inspection and provide a quote for direct costs of duplication of the records within 10 days of this Court's order directing that they do so; 2. That the Court enter an order awarding Petitioner his costs of suit and reasonable attorney's fees and costs incurred in bringing this litigation; 3. For such other relief as this Court deems just and proper. Dated: 1/17/2020 /s/ Robert Ian Stringham By: _ Robert Ian Stringham /s/ Tasha Alyssa Hill By: _ Tasha Alyssa Hill Attorneys for Petitioner

1	VERIFICATION		
2	I, Adrian Riskin, have read the foregoing Petition for Writ of Mandate and know the contents thereof		
3	The same is true of my own knowledge, except as to those matters alleged on information and belief,		
4	and, as to those matters, I also believe them to be true.		
5			
6	I declare under penalty of perjury under the laws of California that the foregoing is true and correct.		
7			
8	Executed on JANUARY 14, 2020, in Los Angeles, California.		
9	11 D · · -		
10	By: Adrian Riskin		
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			
26			
27			
28			

EXHIBIT A

Subject: CPRA request (CD7.2019.07.16.a)

From: adrian@123mail.org **Date:** 7/16/19. 11:15 AM To: tran.le@lacity.org

Good morning, CD7.

Today I am looking for

A. emails between CD7 staff or Ms. Rodriguez from 2019 and any of the following folks:

- 1. Charles Dinse -- email address is either 34920@lapd.lacity.org or 34920@lapd.online
- 2. Fern White (AKA Fern Peskin-White AKA Fern Peskin) -- don't know email address, please search on both "fern white" and "peskin"
- 3. Eileen Blazi -- don't know email address -- please search on "blazi"
- 4. Sean Brown -- email address is either 36253@lapd.lacity.org or 36253@lapd.online
- 5. Duc Dao -- email address is either 34218@lapd.lacity.org or 34218@lapd.online
- 6. 25831@lapd.online or 25831@lapd.lacity.org
- 7. 30905@lapd.online or 30905@lapd.lacity.org
- 8. 35828@lapd.online or 35828@lapd.lacity.org 9. 32740@lapd.online or 32740@lapd.lacity.org
- 10. don8819@icloud.com
- 11. don8819@gmail.com
- B. Emails in possession of any CD7 staff or Ms. Rodriguez from 2019 that contain any of the following search terms:
- 1. encampment
- 2. homeless
- 3. beautification
- 4. planter

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

Note that MBOX files are structured text and can therefore be redacted without altering the file format using find/replace in a text editor (NOT a word processor) to replace actually exempt information with innocuous symbols such as +++++++++++++ or something similar. I also need copies of ALL attachments to these emails in their own native formats. These will automatically be included in the MBOX export.

Thank you, CD7, for your help!

Adrian

1 of 1 10/22/19, 9:16 AM

EXHIBIT B

Subject: Out of Office Re: CPRA request (CD7.2019.07.16.a)

From: "Tran Le" <tran.le@lacity.org>

Date: 7/16/19, 11:15 AM **To:** adrian@123mail.org

Hello and thank you for your message. I am out of the office and will return on Friday, July 19.

For press inquiries, please contact Doug Tripp at doug.tripp@lacity.org or call 213-473-7007.

For social media and other communications-related inquiries, please contact Denaee Amaya at denaee.amaya@lacity.org.

Best, Tran

__

Tran Le, Director of Communications
Councilwoman Monica Rodriguez, 7th District
200 N Spring Street, Rm 455, Los Angeles, CA 90012

Phone: 213-473-7007 Fax: 213-847-0707

www.monicarodriguez.org

htt ht htl

1 of 1 10/22/19, 9:16 AM

EXHIBIT C

Subject: Fwd: CPRA request (CD7.2019.07.16.a)

From: adrian@123mail.org **Date:** 7/16/19, 11:16 AM

To: doug.tripp@lacity.org, denaee.amaya@lacity.org

per Tran Le's away message, thank you!

---- Original message ----From: adrian@123mail.org
To: tran.le@lacity.org

Subject: CPRA request (CD7.2019.07.16.a) Date: Tuesday, July 16, 2019 11:15 AM

Good morning, CD7.

Today I am looking for

- A. emails between CD7 staff or Ms. Rodriguez from 2019 and any of the following folks:
- 1. Charles Dinse -- email address is either 34920@lapd.lacity.org or 34920@lapd.online
- 2. Fern White (AKA Fern Peskin-White AKA Fern Peskin) -- don't know email address, please search on both "fern white" and "peskin"
- 3. Eileen Blazi -- don't know email address -- please search on "blazi"
- 4. Sean Brown -- email address is either 36253@lapd.online
- 5. Duc Dao -- email address is either 34218@lapd.lacity.org or 34218@lapd.online
- 6. <u>25831@lapd.online</u> or <u>25831@lapd.lacity.org</u>
- 7. 30905@lapd.online or 30905@lapd.lacity.org
- 8. 35828@lapd.online or 35828@lapd.lacity.org
- 9. 32740@lapd.online or 32740@lapd.lacity.org
- 10. don8819@icloud.com
- 11. don8819@gmail.com
- B. Emails in possession of any CD7 staff or Ms. Rodriguez from 2019 that contain any of the following search terms:
- 1. encampment
- 2. homeless
- beautification
- 4. planter

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

Thank you, CD7, for your help!

Adrian

1 of 1 10/22/19, 9:16 AM

EXHIBIT D

Subject: Re: CPRA request (CD7.2019.07.16.a)

From: Tran Le <tran.le@lacity.org>

Date: 7/19/19, 2:47 PM **To:** adrian@123mail.org

Dear Adrian,

We have received your email and will search our records per your request. Given the volume of the search terms, we estimate that we will respond by Friday, August 9th. Please do not hesitate to contact us if you have any questions in the meantime.

Best, Tran

On Tue, Jul 16, 2019 at 11:15 AM adrian@123mail.org wrote: Good morning, CD7.

Today I am looking for

A. emails between CD7 staff or Ms. Rodriguez from 2019 and any of the following folks:

- 1. Charles Dinse -- email address is either 34920@lapd.lacity.org or 34920@lapd.online
- 2. Fern White (AKA Fern Peskin-White AKA Fern Peskin) -- don't know email address, please search on both "fern white" and "peskin"
- 3. Eileen Blazi -- don't know email address -- please search on "blazi"
- 4. Sean Brown -- email address is either 36253@lapd.lacity.org or 36253@lapd.online
- 5. Duc Dao -- email address is either 34218@lapd.lacity.org or 34218@lapd.online
- 6. 25831@lapd.online or 25831@lapd.lacity.org
- 7. 30905@lapd.online or 30905@lapd.lacity.org
- 8. 35828@lapd.online or 35828@lapd.lacity.org
- 9. 32740@lapd.online or 32740@lapd.lacity.org
- 10. don8819@icloud.com
- 11. don8819@gmail.com
- B. Emails in possession of any CD7 staff or Ms. Rodriguez from 2019 that contain any of the following search terms:
- 1. encampment
- 2. homeless

1 of 2 10/22/19, 9:16 AM

- 3. beautification
- 4. planter

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

Thank you, CD7, for your help!

Adrian

__

Tran Le, Director of CommunicationsCouncilwoman Monica Rodriguez, 7th District
200 N Spring Street, Rm 455, Los Angeles, CA 90012
Phone: 213-473-7007 Fax: 213-847-0707

www.monicarodriguez.org

htt ht htt

2 of 2 10/22/19, 9:16 AM

EXHIBIT E

Subject: Re: CPRA request (CD7.2019.07.16.a)

From: adrian@123mail.org Date: 8/23/19, 7:22 AM

To: "Tran Le" <tran.le@lacity.org>

Good morning, Ms. Le.

I'm just wondering what's up with this matter?

Also, since you seem to be concerned with "the volume of the search terms" as a reason for delay, perhaps you're unaware that accounts in the City's Gmail system can be searched for multiple keywords in a single operation, so that there is no practical difference between searching for one keyword or a thousand.

Thanks!

Adrian

On Fri, Jul 19, 2019, at 2:48 PM, Tran Le wrote:

Dear Adrian,

We have received your email and will search our records per your request. Given the volume of the search terms, we estimate that we will respond by Friday, August 9th. Please do not hesitate to contact us if you have any questions in the meantime.

Best, Tran

On Tue, Jul 16, 2019 at 11:15 AM adrian@123mail.org wrote: Good morning, CD7.

Today I am looking for

- A. emails between CD7 staff or Ms. Rodriguez from 2019 and any of the following folks:
- 1. Charles Dinse -- email address is either 34920@lapd.lacity.org or 34920@lapd.online
- 2. Fern White (AKA Fern Peskin-White AKA Fern Peskin) -- don't know email address, please search on both "fern white" and "peskin"
- 3. Eileen Blazi -- don't know email address -- please search on

1 of 3

"blazi"

- 4. Sean Brown -- email address is either $\underline{36253@lapd.lacity.org}$ or 36253@lapd.online
- 5. Duc Dao -- email address is either 34218@lapd.lacity.org or 34218@lapd.online
- 6. 25831@lapd.online or 25831@lapd.lacity.org
- 7. 30905@lapd.online or 30905@lapd.lacity.org
- 8. 35828@lapd.online or 35828@lapd.lacity.org
- 9. 32740@lapd.online or 32740@lapd.lacity.org
- 10. don8819@icloud.com
- 11. don8819@gmail.com
- B. Emails in possession of any CD7 staff or Ms. Rodriguez from 2019 that contain any of the following search terms:
- 1. encampment
- 2. homeless
- 3. beautification
- 4. planter

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

Note that MBOX files are structured text and can therefore be redacted without altering the file format using find/replace in a text editor (NOT a word processor) to replace actually exempt information with innocuous symbols such as +++++++++++++++ or something similar. I also need copies of ALL attachments to these emails in their own native formats. These will automatically be included in the MBOX export.

Thank you, CD7, for your help!

Adrian

. _

Tran Le, Director of Communications
Councilwoman Monica Rodriguez, 7th District
200 N Spring Street, Rm 455, Los Angeles, CA 90012

Phone: 213-473-7007 Fax: 213-847-0707 www.monicarodriguez.org

htt ht htl

Re: CPRA request (CD7.2019.07.16.a)

3 of 3 10/22/19, 9:16 AM

EXHIBIT F

Subject: Re: CPRA request (CD7.2019.07.16.a)

From: adrian@123mail.org **Date:** 9/16/19, 1:40 PM

To: "Tran Le" <tran.le@lacity.org>

Good afternoon, Ms. Le!

I'm just wondering what's up with this, as a response was due ever so long ago and yet CD7 has not responded.

Thanks!

Adrian

On Fri, Aug 23, 2019, at 7:22 AM, adrian@123mail.org wrote:

Good morning, Ms. Le.

I'm just wondering what's up with this matter?

Also, since you seem to be concerned with "the volume of the search terms" as a reason for delay, perhaps you're unaware that accounts in the City's Gmail system can be searched for multiple keywords in a single operation, so that there is no practical difference between searching for one keyword or a thousand.

Thanks!

Adrian

On Fri, Jul 19, 2019, at 2:48 PM, Tran Le wrote:

Dear Adrian,

We have received your email and will search our records per your request. Given the volume of the search terms, we estimate that we will respond by Friday, August 9th. Please do not hesitate to contact us if you have any questions in the meantime.

Best, Tran

On Tue, Jul 16, 2019 at 11:15 AM adrian@123mail.org wrote: Good morning, CD7.

Today I am looking for

- A. emails between CD7 staff or Ms. Rodriguez from 2019 and any of the following folks:
- 1. Charles Dinse -- email address is either 34920@lapd.lacity.org or 34920@lapd.online
- 2. Fern White (AKA Fern Peskin-White AKA Fern Peskin) -- don't know email address, please search on both "fern white" and "peskin"
- 3. Eileen Blazi -- don't know email address -- please search on "blazi"
- 4. Sean Brown -- email address is either <a>36253@lapd.lacity.org or 36253@lapd.online
- 5. Duc Dao -- email address is either 34218@lapd.lacity.org or 34218@lapd.online
- 6. 25831@lapd.online or 25831@lapd.lacity.org
- 7. 30905@lapd.online or 30905@lapd.lacity.org
- 8. 35828@lapd.online or 35828@lapd.lacity.org
- 9. 32740@lapd.online or 32740@lapd.lacity.org
- 10. don8819@icloud.com
- 11. don8819@gmail.com
- B. Emails in possession of any CD7 staff or Ms. Rodriguez from 2019 that contain any of the following search terms:
- 1. encampment
- 2. homeless
- 3. beautification
- 4. planter

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

2 of 3 10/22/19, 9:16 AM

Thank you, CD7, for your help!
Adrian

- -

Tran Le, Director of Communications Councilwoman Monica Rodriguez, 7th District 200 N Spring Street, Rm 455, Los Angeles, CA 90012

Phone: 213-473-7007 Fax: 213-847-0707 <u>www.monicarodriguez.org</u>

htt ht htl

3 of 3 10/22/19, 9:16 AM

EXHIBIT G

Subject: Re: CPRA request (CD7.2019.07.16.a)

From: adrian@123mail.org Date: 10/7/19, 6:52 AM

To: "Tran Le" <tran.le@lacity.org>

Good morning, Ms. Le.

I am just wondering what is going on with this. A response was due more than two months ago and yet I have not received one. The request itself is three months old, also unacceptable.

thanks!

Adrian

On Mon, Sep 16, 2019, at 1:40 PM, adrian@123mail.org wrote:

Good afternoon, Ms. Le!

I'm just wondering what's up with this, as a response was due ever so long ago and yet CD7 has not responded.

Thanks!

Adrian

On Fri, Aug 23, 2019, at 7:22 AM, adrian@123mail.org wrote:

Good morning, Ms. Le.

I'm just wondering what's up with this matter?

Also, since you seem to be concerned with "the volume of the search terms" as a reason for delay, perhaps you're unaware that accounts in the City's Gmail system can be searched for multiple keywords in a single operation, so that there is no practical difference between searching for one keyword or a thousand.

Thanks!

Adrian

On Fri, Jul 19, 2019, at 2:48 PM, Tran Le wrote:

Dear Adrian,

We have received your email and will search our records per

your request. Given the volume of the search terms, we estimate that we will respond by Friday, August 9th. Please do not hesitate to contact us if you have any questions in the meantime.

Best, Tran

On Tue, Jul 16, 2019 at 11:15 AM adrian@123mail.org wrote: Good morning, CD7.

Today I am looking for

- A. emails between CD7 staff or Ms. Rodriguez from 2019 and any of the following folks:
- 1. Charles Dinse -- email address is either 34920@lapd.lacity.org or 34920@lapd.online
- 2. Fern White (AKA Fern Peskin-White AKA Fern Peskin) -don't know email address, please search on both "fern white" and "peskin"
- 3. Eileen Blazi -- don't know email address -- please search on "blazi"
- 4. Sean Brown -- email address is either 36253@lapd.lacity.org or 36253@lapd.online
- 5. Duc Dao -- email address is either 34218@lapd.lacity.org or 34218@lapd.online
- 6. 25831@lapd.online or 25831@lapd.lacity.org
- 7. 30905@lapd.online or 30905@lapd.lacity.org
- 8. 35828@lapd.online or 35828@lapd.lacity.org
- 9. 32740@lapd.online or 32740@lapd.lacity.org
- 10. don8819@icloud.com
- 11. don8819@gmail.com
- B. Emails in possession of any CD7 staff or Ms. Rodriguez from 2019 that contain any of the following search terms:
- 1. encampment
- 2. homeless
- beautification
- 4. planter

I need copies of these emails in MBOX format, which the City's Gmail system allows each user to export via Google Takeouts. Please note that provision of emails in this format is required by the CPRA at section 6253.9. If you all

2 of 3 10/22/19, 9:16 AM

need help in executing the export procedure you might contact Colin Sweeney of CD12, who has prepared a handy instruction sheet for City email users responding to CPRA requests.

Thank you, CD7, for your help!

Adrian

- -

Tran Le, Director of Communications
Councilwoman Monica Rodriguez, 7th District
200 N Spring Street, Rm 455, Los Angeles, CA 90012

Phone: 213-473-7007 Fax: 213-847-0707

www.monicarodriguez.org

htt ht htl

3 of 3 10/22/19, 9:16 AM